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10 Attorneys for Defendant  
11 LG ELECTRONICS USA, INC.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 JEFF JAFARIAN, on behalf of himself  
15 and all other similarly situated,

16 Plaintiff,

17 v.

18 SHARP CORPORATION, et al.,

19 Defendants.

20 **Case No. 06-CV-7588 SI**

21 **STIPULATION AND [PROPOSED]**  
22 **ORDER FOR EXTENSION OF**  
23 **TIME**

**STIPULATION FOR EXTENSION OF TIME**

WHEREAS plaintiff filed a complaint in the above-captioned case on or about February 16, 2007;

WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal Display (LCD") products;

WHEREAS more than fifteen complaints have been filed to date in federal district courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively, "the LCD Cases");

WHEREAS there is a motion pending before the Judicial Panel on Multidistrict Litigation to transfer the LCD Cases to the Northern District of California for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS plaintiff anticipates the possibility of Consolidated Amended Complaints in the LCD Cases;

WHEREAS plaintiff and LG Electronics USA, Inc. ("LG USA") have agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient for the parties and for the Court;

WHEREAS plaintiff agrees that the deadline for LG USA to respond to the Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after plaintiff provided written notice to LG USA that plaintiff does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case;

WHEREAS plaintiff further agrees that this extension is available, without further stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of their intention to join this extension;

WHEREAS this Stipulation does not constitute a waiver by LG USA or any defendant of any

1 defense, including but not limited to the defense of lack of personal or subject matter jurisdiction,  
2 insufficiency of process, insufficiency of service of process, or improper venue.

3 PLAINTIFF AND DEFENDANT LG USA, BY AND THROUGH THEIR RESPECTIVE  
4 COUNSEL OR RECORD, HEREBY STIPULATE AS FOLLOWS:

5 1. The deadline for LG USA to respond to the Complaint shall be extended until the  
6 earlier of the following two dates (1) forty-five days after the filing of a Consolidated Amended  
7 Complaint in the LCD Cases; or (2) forty-five days after the plaintiff provides written notice that he  
8 does not intend to file a Consolidated Amended Complaint, provided that such notice may be given  
9 only after the initial case management conference in the MDL transferee court in this case.

10 2. This extension is available, without further stipulation with counsel for plaintiff or  
11 further order of the Court, to all named defendants who notify plaintiff in writing of their intention to  
12 join this extension.

13 IT IS SO STIPULATED.

14  
15 Dated: March 19, 2007

WINSTON & STRAWN LLP

16  
17 By: 

18 Neal R. Marder  
David J. Altman  
Attorneys for Defendant  
LG ELECTRONICS USA, INC.

19  
20 Dated: March 19, 2007


FURTH LEHMANN & GRANT LLP

21  
22 By: 

23 Christopher L. Lebsock  
Attorneys for Plaintiff  
JEFF JAFARIAN

PURSUANT TO STIPULATION, IT IS  
SO ORDERED

Dated: \_\_\_\_\_



Honorable Susan Illston  
Judge of the United States District Court

CHI:1880491.2